

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-18 were pending in the present patent application. By way of this reply, claims 19-26 have been added. Applicant respectfully asserts no new matter has been introduced by way of these additions. Also, by way of this reply, claims 3, 12, 14, and 16-18 have been cancelled without prejudice or disclaimer. Accordingly, claims 1, 2, 4-11, 13, 15, and 19-26 are now pending in the present patent application. Claims 1, 7, 11, 19, and 25 are independent. The remaining claims depend, either directly or indirectly, from claims 1, 7, 11, 19, and 25.

**Rejections under 35 U.S.C. §102**

Claims 1-18 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,600,790 issued to Barnstijn et al. (hereinafter "Barnstijn"). By way of this reply, claims 3, 12, 14, and 16-18 have been cancelled and thus the rejection is moot as to those claims. As for the remaining claims, for the reasons set forth below, this rejection is respectfully traversed.

Independent claim 1 recites, in part, "An apparatus for facilitating development of an application for an entire wireless-connected device, comprising: a module having a plurality of development tools for use in the creation of the application; and an emulator of the entire wireless-connected device integrated with the module, wherein the emulator executes the application." Independent claims 7 and 11 have similar limitations. The Examiner has attempted

to equate the emulator as recited in the claims with the MPT wireless device disclosed by Barnstijn. (*See* Office Action dated October 5, 2005 at page 3). This association is improper because the MPT wireless device disclosed by Barnstijn is not a wireless device emulator but rather the actual wireless device itself. (*See* Barnstijn at column 4, lines 54-64).

Further, the present invention relates to software development tools utilizing integrated emulators for developing applications that are executed on wireless devices. Specifically, the present invention relates to using an emulator that emulates an entire wireless device, where the emulator runs on a virtual machine and executes an application developed for the emulated wireless device (*See* Specification, page 8, paragraph 19).

In contrast, Barnstijn discloses a method and system to test a computer program designed to operate on a target system (*e.g.*, “wireless device”). However, Barnstijn requires the actual wireless device to be present and connected with a host computer to perform the testing. (*See* Figure 4). Barnstijn discloses both input and output events are physically executed or initiated using the wireless device’s hardware while one or more applications under development (for the wireless device) on the host computer interact with the connected wireless device. (*See* Barnstijn at column 2, line 57 to column 3, line 30). Thus, certain aspects of the wireless device (*i.e.*, input and output events) are not emulated but rather executed or initiated by the actual wireless device. This squarely contradicts the limitation recited in the independent claims requiring the entire wireless device be emulated. Thus, Barnstijn does not disclose all the limitations of independent claims 1, 7, and 11.

In view of the above, independent claims 1, 7, and 11 are patentable over Barnstijn. Claims 2, 4-6, 8-10, 13, and 15 depend, either directly or indirectly, from claims 1, 7, and 11 and

are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 1-18 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication No. 2002/0103881 (hereinafter "Granade"). By way of this reply, claims 3, 12, 14, and 16-18 have been cancelled and thus the rejection is moot as to those claims. As for the remaining claims, for the reasons set forth below, this rejection is respectfully traversed.

Independent claim 1 recites, in part, "An apparatus for facilitating development of an application for an entire wireless-connected device, comprising: a module having a plurality of development tools for use in the creation of the application; and an emulator of the entire wireless-connected device integrated with the module, wherein the emulator executes the application." Independent claims 7 and 11 have similar limitations. The Examiner has attempted to equate the emulator as recited in the claims with the Backend System Emulator disclosed by Granade. (*See* Office Action dated October 5, 2005). This association is improper as the Backend System Emulator disclosed by Granade neither emulates wireless devices nor executes applications designed to run on wireless devices. Granade discloses a mobile application platform which is accessed by wireless devices to connect with backend systems. The mobile application platform is also used to format (*e.g.*, adjust for screen size) content retrieved from the backend systems for a specific wireless device. (*See* Granade at paragraph [0029]). The Backend System Emulator disclosed by Granade is used for simulating the interaction between the mobile application platform and the backend systems. In other words, the Backend System Simulator is used for testing the mobile application platform prior to deploying the mobile application platform. (*See* Granade at paragraph [0028]). However, Granade does not contemplate using the Backend System Emulator to emulate an entire wireless device, nor does Granade contemplate

using the Backend System Emulator to execute an application designed to run on a wireless device. Thus, Granade does not teach or suggest all the limitations of independent claims 1, 7, and 11.

In view of the above, independent claims 1, 7, and 11 are patentable over Granade. Claims 2, 4-6, 8-10, 13, and 15 depend, either directly or indirectly, from claims 1, 7, and 11 and are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

#### **New Claims**

By way of this reply, claims 19-26 have been added. No new matter has been added by way of these additions as support for these additions may be found, for example, in Figures 9, 10, and 14 and in paragraphs [0045], [0046], and [0059] of the published specification. New independent claims 19 and 25 recite methods for facilitating development of an application for a wireless-connected device using an emulator of the entire wireless-connected device. Thus, independent claims 19 and 25 are also patentable over Granade and Barnstijn for the same reasons stated above regarding independent claims 1 and 7. Specifically, neither Granade nor Barnstijn teach each and every element of the claims. Claims 20-24 and 26 depend directly from claims 19 and 25 and are allowable for at least the same reasons.

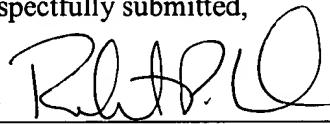
**Conclusion**

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 16159/012001; P5534CNT).

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Respectfully submitted,

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